

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY, and
MYRTLE HATHAWAY,

Plaintiffs,

v.

PUTNAM INVESTMENT MANAGEMENT,
LLC and PUTNAM RETAIL MANAGEMENT,
LLP,

Defendants.

Civil Action No. 04-10988-GAO

ORAL ARGUMENT REQUESTED

**PLAINTIFFS' MOTION TO COMPEL DEFENDANTS TO RESPOND TO
PLAINTIFFS' FIRST SET OF REQUESTS FOR THE PRODUCTION OF
DOCUMENTS**

Plaintiffs respectfully move the Court for an order compelling Defendants Putnam Investment Management and Putnam Retail Management (collectively, "Putnam") to produce the documents requested in Plaintiffs' First Set of Requests for the Production of Documents.

The grounds for this Motion are set forth in the accompanying Memorandum of Law and the Affidavit of Lisa Furnald.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), Plaintiffs respectfully request a hearing on the within motion.

Dated: April 27, 2006

Respectfully submitted,

/s/ Lisa A. Furnald

David E. Marder (BBO #552485)

Marc N. Henschke (BBO #636146)